

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CAUSE NO. 4:21-CR-0588
	§	
ANTHONY HUTCHINSON and	§	
BRIAN BUSBY	§	Judge Andrew S. Hanen
	§	
Defendants.	§	UNDER SEAL

MOTION TO AMEND CONDITIONS OF RELEASE

The Defendant, through his undersigned counsel, Dick DeGuerin and Mark White, III, Agreed Motion to Amend Conditions of Release and would show the following:

I.

The Defendant is on bond with travel restrictions permitting him to travel outside Texas with the prior approval of his Pretrial Services officer. His children learned well after the fact that his travel was restricted in that way; and so, when they learned of the restriction, they disclosed to him that they previously bought him plane tickets to Puerto Rico for a surprise family get-away. When the Defendant asked his supervising Pretrial Services officer for approval to travel to Puerto Rico, he learned that the Court would have to approve this particular travel event since it was outside the continental United States.

II.

Therefore, the Defendant respectfully asks the Court to authorize the Defendant to travel to Puerto Rico from August 12-16, 2022. AUSA Rob Johnson is not opposed.

Respectfully submitted,

DeGUERIN & DICKSON

/s/ Dick DeGuerin

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed on the 14th day of July 2022, via the electronic case filing system of the Southern District of Texas, which sent a notice of filing to all interested parties.

/s/ Mark White

Mark White, III

CERTIFICATE OF CONFERENCE

I certify that I communicated with AUSA Rob Johnson regarding the above agreed motion via email on July 13, 2022. He agreed to the relief requested therein.

/s/ Mark White
Mark White, III

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ORDER

The Court considered the Motion to Amend Conditions of Release and does hereby
ORDER that the Defendant Brian Busby may travel to Puerto Rico as contemplated in the above
motion.

Signed _____, 2022.

HON. ANDREW HANEN
U.S. DISTRICT JUDGE